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Attorneys for Plaintiff  
United States of America

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
ALMA GARZA,  
  
Defendant.

Case No: 1:22-CR-00062-JLT

STIPULATION BETWEEN THE UNITED STATES  
AND DEFENDANT REGARDING PRODUCTION  
OF DISCOVERY; PROTECTIVE ORDER RE:  
SAME

WHEREAS, this Court may enter protective orders pursuant to Fed. R. Crim. P. 16(d) and its general supervisory authority.

WHEREAS, certain discovery in this case (a law enforcement report and a sealed wiretap application document ) (the “discovery”) contains information shared with law enforcement by a cooperating witness;

WHEREAS, the parties desire to avoid the unauthorized dissemination or distribution to anyone not a party to the court proceedings in this matter, and the risk of harm (financial and/or physical) to the individual identified in those materials, including by dissemination of the discovery by defendant;

The parties agree that entry of a stipulated protective order is appropriate.

1           THEREFORE, the below-listed defendant, by and through their undersigned counsel of record  
2 (“Defense Counsel”), and the United States of America, by and through Assistant United States  
3 Attorney Justin J. Gilio, hereby agree and stipulate as follows:

4           1.       This Court may enter a protective order pursuant to Rule 16(d) of the Federal Rules of  
5 Criminal Procedure, and its general supervisory authority.

6           2.       This Order pertains to all discovery marked with a bates stamp “protected” provided to or  
7 made available to Defense Counsel in this case.

8           3.       The discovery is for the exclusive use of defense counsel who are either assigned to or  
9 consulting on this case, any investigators, interpreters, experts, paralegals, legal assistants, or law clerks  
10 assisting counsel in this case (“the Defense”). The parties agree that the Defense may review the discovery  
11 with the defendant or other necessary third parties only in the presence of a member of the Defense and  
12 **may NOT provide a copy of the discovery to or leave a copy of the discovery with the defendant or**  
13 **other necessary third party. The defendant or other necessary third party may NOT retain copies**  
14 **of the discovery in any form, including but not limited to notes or photographs concerning the**  
15 **contents of the discovery.**

16           4.       The discovery and information therein may be used only in connection with the litigation  
17 of this case and for no other purpose. The discovery is now and will forever remain the property of the  
18 United States of America (“Government”). Defense Counsel will return the discovery to the Government  
19 or alternatively keep it archived within its sole possession at the conclusion of the case.

20           5.       Defense Counsel will store the discovery in a secure place and will use reasonable care to  
21 ensure that it is not disclosed to third persons (or even the defendant) in violation of this agreement.

22           6.       Defense Counsel shall be responsible for advising the Defendant, employees, and other  
23 members of the defense team, and defense witnesses of the contents of this Stipulation and Order.

24           7.       In the event that Defendant substitutes counsel, undersigned Defense Counsel agrees to  
25 return the discovery to the government, or, at the request of government counsel, to forward it to new  
26 counsel after new counsel has confirmed to government counsel in writing his or her agreement to the  
27 terms of this Order.

8. Nothing in this Order shall preclude a party from seeking a more restrictive protective order or other court order with regard to particular discovery items.

IT IS SO STIPULATED.

Dated: July 26, 2024

By: /s/ Scott Quinlan  
Scott Quinlan  
Attorney for Defendant Alma Garza

Dated: July 26, 2024

PHILLIP A. TALBERT  
United States Attorney

By: /s/ Justin J. Gilio  
Justin J. Gilio  
Assistant U.S. Attorney

IT IS SO ORDERED.

Dated: 7/30/2024

*Sheila K. Oberto*

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Hon. SHEILA K. OBERTO  
UNITED STATES MAGISTRATE JUDGE